

**UNITED STATES BANKRUPTCY COURT  
EASTERN & WESTERN DISTRICT OF ARKANSAS**

**RE: MARJORIE GAIL SMITH**

**NO. 6:13-bk-72584**

**NOTICE OF OPPORTUNITY TO OBJECT TO MODIFIED PLAN BEFORE CONFIRMATION**

You are hereby notified that the captioned debtor has filed the attached modification to the plan pursuant to 11 U.S.C. §1323 and Rule 3015 of the Rules of Bankruptcy Procedure. Objections to the plan as modified must be filed with the Bankruptcy Court at 300 W. 2<sup>nd</sup> Street, Little Rock, AR 72201 in writing within 28 days from the date of this notice, with copies to the Counsel for the debtor and Jack W. Gooding, Trustee, PO Box 8202, Little Rock, Arkansas 72221-8202.

If objections to the Plan as Modified are filed, they will be set for hearing by subsequent notice. If no objections are received, the Plan as Modified may be confirmed without further notice or hearing.

**DICKERSON LAW FIRM, P.A.  
PO BOX 6400  
HOT SPRINGS, AR 71902  
501-321-0808  
FAX 501-321-2954**

January 7, 2014  
DATE

/s/ James C. Hunt  
**JAMES C. HUNT, BAR #2003-202**

**CERTIFICATE OF MAILING**

I, the undersigned, hereby certify that copies of the foregoing notice and attached Modification to Plan have been mailed to:

Jack W. Gooding, Trustee  
PO Box 8202  
Little Rock, AR 72221-8202

Internal Revenue Service  
Special Procedure  
PO Box 7346  
Philadelphia, PA 19101

U.S. Attorney (Eastern District)  
PO Box 1229  
Little Rock, AR 72203

U.S. Attorney (Western District)  
414 Parker Avenue  
Fort Smith, AR 72901

and to all creditors whose names appear on the attached modification and/or creditor matrix:

/s/ James C. Hunt  
**Dickerson Law Firm, P.A.**

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN AND WESTERN DISTRICTS OF ARKANSAS**

**RE: MARJORIE GAIL SMITH**

**NO. 6:13-bk-72584**

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**MODIFICATION OF CHAPTER 13 PLAN**  
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Comes now the Debtor by and through her attorneys, Dickerson Law Firm, P.A., and for her modification to the original or modified Chapter 13 plan states:

**1. PAYMENT TO THE TRUSTEE:**

THE DEBTOR PROPOSES TO PAY \$725.00 PER MONTH TO THE TRUSTEE BEGINNING JANUARY 2014. DEBTOR DOES NOT INTENT TO CURE ANY PLAN DELIQUENCY THAT MAY BE CALCULATED.

[Indicate how often the Debtor is paid by checking the appropriate box below:]

( ) Weekly; ( ) Bi-Weekly; ( ) Semi-Monthly; (XX) Monthly or ( ) Other

**2. THE PLAN LENGTH shall remain the same.**

A debtor must pay all disposable income into the plan for the benefit of unsecured creditors during the applicable commitment period (unless unsecured are being paid 100%) and the plan length shall not exceed 60 months. Length of Plan may be automatically extended by the Chapter 13 Trustee without further modification should such extension be necessary to adequately fund plan in order to carry out other provisions of the plan as set forth below.

**3. UNSECURED CREDITORS are to be paid a pro rata dividend.**

**(SPECIAL NON-PRIORITY UNSECURED DEBTS REMAIN UNAFFECTED)**

**4. MODIFIED TREATMENT OF EXISTING CREDITORS**

The following CHANGES are to be made to each creditor as set out below:

CREDITOR NAME

CHANGE IN TREATMENT\CLASSIFICATION

1. Nationstar Mortgage  
Claim# 1

Secured mortgage claim of \$20,334.75 shall be paid in full in monthly installments of \$395.00 and 6% interest. Creditor shall not receive pre or post confirmation adequate protection. Debtor shall be specifically responsible for any and all accrued taxes or insurance that may be owing or come due post-petition. Upon entry of the Debtor's discharge order the mortgage shall be declared satisfied and creditor, or its assignee, shall within 60 days of the entry of Debtor's discharge cause to be filed a notice of mortgage release in the county land records of Garland County, Arkansas.

**PRE-PETITION UNSECURED CREDITORS SHALL BE PAID A PRO RATA DIVIDEND.**

**POST-PETITION UNSECURED CREDITORS SHALL BE PAID A PRO RATA DIVIDEND.**

5. **UNSECURED CREDITORS** shall be paid at least as much as they would receive under Chapter 7.

**Respectfully Submitted**

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/s/ James C. Hunt  
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